

# EXHIBIT 70

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**From:** [Michael Murphy](#)  
**To:** [Zachary Hansen](#)  
**Cc:** [Michael Murphy, Jr.](#); [Carmen](#); [Bryan Sullivan](#); [abbelowellpublicoutreach@winston.com](#); [Salvaty, Paul B.](#); [Ellis, Gregory A.](#)  
**Subject:** FW: Robert Hunter Biden v. Patrick M. Byrne (Federal Case No.: 2:23-cv-09430-SVW-PD) -Motion for Summary Judgment/Adjudication  
**Date:** Monday, September 30, 2024 7:54:08 AM

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Hi Zachary:

Please see the e-mail below that I sent to you on August 17, 2024, regarding our client's intent to proceed with a motion for summary judgment. The e-mail was sent to you almost two months ago. Pursuant to FRCP 56, this e-mail is to further notify you that we plan to file the motion and have it set to be heard by the end of this week. This case has been pending for almost ten months.

Very truly yours,

Michael C. Murphy, Esq.

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**From:** Michael Murphy  
**Sent:** Saturday, August 17, 2024 8:54 AM  
**To:** 'Zachary Hansen' <zhansen@earlysullivan.com>; Michael Murphy, Jr. <cmichael.jr@murphlaw.net>  
**Cc:** 'Bryan Sullivan' <bsullivan@earlysullivan.com>; 'AbbeLowellPublicOutreach@winston.com' <AbbeLowellPublicOutreach@winston.com>; 'Salvaty, Paul B.' <PSalvaty@winston.com>; 'Ellis, Gregory A.' <GAEllis@winston.com>; Michael Murphy, Jr. <cmichael.jr@murphlaw.net>; Carmen <Carmen@murphlaw.net>  
**Subject:** RE: Robert Hunter Biden v. Patrick M. Byrne (Federal Case No.: 2:23-cv-09430-SVW-PD) - Motion for Summary Judgment/Adjudication

Hi Zachary:

This e-mail is to provide you with notice that pursuant to FRCP 56, we intend to bring a motion for summary judgment and/or for summary adjudication of issues and within the next 60 days to ensure that the motion is timely and can be heard by the court before the pretrial conference and trial. I am giving you this notice to ensure that you have the opportunity to take whatever action you deem appropriate to get your discovery completed and so that you can address the issues set forth in our motion.

Have a great weekend.

Very truly yours,